

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

SHERLYNN LOUISE HAYNIE,)	
)	
Plaintiff,)	
V)	Case No.
)	
PAUL BREDENKAMP,)	
)	
Defendant.)	

NOTICE OF REMOVAL

Defendant, Paul Bredenkamp, United States Postal Service, hereby gives notice, by and through his attorneys, Richard G. Callahan, United States Attorney for the Eastern District of Missouri, and Nicholas P. Llewellyn, Assistant United States Attorney for said District, pursuant to 28 U.S.C. §§ 1446(a) & 1442(a)(1), that he is removing this action to the United States District Court for the Eastern District of Missouri, Eastern Division, on the following grounds:

1. Paul Bredenkamp is a respondent in a civil action now pending in the Circuit Court of Twenty First Judicial Circuit of the County of St. Louis, State of Missouri, Case No. 16SL-PN02295.

2. The action in state court against Paul Bredenkamp alleges that Respondent “placed or attempted to place me in apprehension of immediate physical harm”; [he] “stalked me”; “harassed me” and “followed me from place to place” within the workplace at the St. Louis Metro Annex in Hazelwood, Missouri. See Plaintiff’s Petition. Specifically, in paragraph 11 of her Petition, Plaintiff alleges that while she was working at the United States Postal Service on March 24, 2016, “Hazelwood Police called to 5463 Phantom” because her supervisor, Paul Bredenkamp, “threatened to fire me if I didn’t perform oral sex on him.” In paragraph 12 of her Petition, Plaintiff alleges she “**believe[s]** [she has] seen Respondent more than 5 times following [her] in [her] neighborhood where [she] live[s].” (emphasis added) Plaintiff is requesting that

her supervisor, Paul Bredenkamp, not be allowed to communicate with Petitioner in any manner or through any medium. See Plaintiff's Petition

3. This Notice of Removal is brought pursuant to 28 U.S.C. § 1442(a)(1). As set forth in 28 U.S.C. § 1442(a)(1), a civil action commenced in a state court against the United States or "any agency thereof or any officer (or any person acting under that officer) of the United States or of any agency thereof, sued in an individual capacity for any act under color of such office . . ." may be removed "to the district court of the United States for the district and division embracing the place wherein it is pending."

4. The acts alleged against Paul Bredenkamp are causally related to his position as Sherlynn Louise Haynie's supervisor at the United States Postal Service and are "acts under color of office".

5. As required by 28 U.S.C. § 1446(a), "...a copy of all process, pleadings, and orders served upon such defendant...", are attached.

WHEREFORE, this action, now pending in the Circuit Court of the Twenty-First Judicial Circuit of the County of St. Louis, State of Missouri, is removed to this Court.

Respectfully submitted,

RICHARD G. CALLAHAN
United States Attorney

/s/ Nicholas P. Llewellyn
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CERTIFICATE OF SERVICE

I certify that on June 1, 2016, a copy of the *Notice of Removal* was filed electronically with the Clerk of the Court, and a copy was mailed to:

Sherlynn Louise Haynie
4001 Ashbury Crossing Drive
Florissant, MO 63034
Plaintiff Pro Se

/s/ Nicholas P. Llewellyn
NICHOLAS P. LLEWELLYN
Assistant United States Attorney